HEARING DATE AND TIME: April 29, 2014 at 9:45 a.m. (Eastern Time) OPPOSITION BRIEF DEADLINE: February 27, 2014

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Attorneys for Defendant DLA Piper LLP (US)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

ICP STRATEGIC CREDIT INCOME FUND LTD., et al.,

Debtors in Foreign Proceedings.

ICP STRATEGIC CREDIT INCOME MASTER FUND LTD., ICP STRATEGIC CREDIT INCOME FUND LTD., and HUGH DICKSON and STEPHEN AKERS, solely in their capacity as the Foreign Representatives and Joint Official Liquidators of ICP Strategic Credit Income Fund Ltd. and ICP Strategic Credit Income Master Fund Ltd.,

Plaintiffs,

-against-

DLA PIPER LLP (US),

Defendant.

Chapter 15 Case

Case No. 13-12116 (REG)

(Jointly Administered)

Adv. Pro. No. 14-01835 (REG)

(Procedurally Consolidated Under This Matter)

PROPOSED ORDER GRANTING DLA PIPER LLP (US)'S MOTION TO DISMISS THE COMPLAINT

UPON consideration of Defendant DLA Piper LLP (US)'s Motion to Dismiss the

Complaint in the above-captioned matter (the "Motion") dated January 24, 2014, by its

attorneys, Gibson, Dunn & Crutcher LLP, and due and proper notice of the Motion having been

provided, and it appearing that no other or further notice need be provided; and a hearing (the

"Hearing") having been held before this Court on April 29, 2014 in accordance with applicable

law; and it appearing, upon due deliberation, that good and sufficient cause exists to grant the

relief requested in the Motion, including those set forth in the Motion and at the Hearing, it is

hereby

ORDERED, that the Motion is GRANTED and the Complaint is hereby DISMISSED

WITH PREJUDICE.

Dated: New York, New York

____, 2014

HONORABLE ROBERT E. GERBER UNITED STATES BANKRUPTCY JUDGE

2

CERTIFICATE OF SERVICE

I, GRACE WAGNER, hereby certify, under penalty of perjury pursuant to 28 U.S.C. § 1746, that on this 24th day of January, 2014, I served PROPOSED ORDER GRANTING DLA PIPER LLP (US)'S MOTION TO DISMISS THE COMPLAINT, by United States Mail and Email, upon the following counsel of record:

Joshua J. Bruckerhoff, Esq. Reid Collins & Tsai LLP 1301 S. Capital of Texas Hwy Building C, Suite 300 Austin, TX 78746

Mac Wagner

Grace Wagner